



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

March 15, 2001

Robert M. Duncan, Treasurer
RNC - Republican National Committee
310 First Street S.E.
Washington, DC 20003

Identification Number: C00003418

Reference: September Monthly Report (8/1/00-8/31/00)

Dear Mr. Duncan:

On February 14, 2001, you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

Your March 1, 2001 response is incomplete because you have not provided all the requested information. For this response to be considered adequate, the following information is still required.

-Your response states that your committee is unaware of any transfers outside of the permissible period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment of the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2)

Schedule H3 of your report discloses transfers for the events E8, M8, and S8 that occurred on August 16, 2000. Schedule H4 of your report discloses disbursements for these events made after August 26, 2000, more than 10 days after the transfer of funds. Therefore, it appears that the transfers on Schedule H3 are reimbursing your committee for activity outside of the permissible time period.

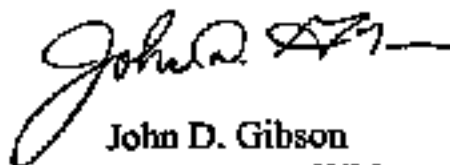
The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Your response states that "regarding your inquiry relating to certain administrative expenses, the RNC will amend its reports to reflect federal disbursements and is making the appropriate reimbursements to the non-federal account". However, the disclosure of some administrative expenses on Schedule H4 still appear to be 100% non-federal activities. 11 CFR §106.5(g) states that a committee shall pay the entire amount of an allocable expense from its federal account and shall transfer funds from its non-federal account solely to cover the non-federal share of that allocable expense. The Administrative/Voter Drive activity disclosed on your report as 100% non-federal does not represent payments for allocable expenses of joint federal and non-federal activities. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. If you have transferred any funds back to your non-federal account, you should clarify this in writing and provide copies of the transfer checks. Please amend your report to clarify this discrepancy.

An adequate response must be received at the Commission by April 4, 2001. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

If you should have any questions related to this matter, please contact Dominick Ciaraldi on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,



John D. Gibson
Assistant Staff Director
Reports Analysis Division

